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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CELLINK CORP.

Plaintiff,

vs.

MANAFLEX LLC,

Defendant.

CASE NO. 4:23-cv-04231-HSG

**STIPULATION REGARDING
EXTENSION OF TIME TO RESPOND
TO FIRST AMENDED COMPLAINT;
ORDER**

[Civil L.R. 6-1, 6-2]

Demand for Jury Trial

Complaint Filed: August 18, 2023

FAC Filed: November 22, 2024

1 Pursuant to Local Civil Rules 6-1 and 6-2, Plaintiff CelLink Corporation (“CelLink”) and
2 Defendant Manaflex LLC (“Manaflex”) stipulate to extend Manaflex’s deadline for its response to
3 the First Amended Complaint.

4 WHEREAS, on November 19, 2024, CelLink’s Motion for Leave to File Amended
5 Complaint was granted by this Court;

6 WHEREAS, CelLink’s First Amended Complaint was filed and served on
7 November 22, 2024;

8 WHEREAS, Manaflex’s response to the First Amended Complaint is due on
9 December 6, 2024;

10 WHEREAS, this requested extension is warranted due to the significant changes and
11 additions within the Amended Complaint, including two new individual defendants, as well as
12 delay caused by leave due to the Thanksgiving holiday. Anderson Decl. ¶ 4.

13 WHEREAS, there have been six previous extensions of time in this case:

14 (1) a stipulated extension of time to respond to the complaint that was filed on
15 September 11, 2023 and granted on September 12, 2023. Anderson Decl. ¶ 5.

16 (2) a stipulated extension of time for the Parties to file a Joint Case Management Statement
17 and selecting an ADR process that was filed on November 7, 2023 and granted on
18 November 8, 2023. *Id.*

19 (3) a stipulated extension of time to respond to counterclaims that was filed on
20 November 27, 2023 and granted on November 28, 2023. *Id.*

21 (4) a stipulated extension of time to respond to counterclaims that was filed on
22 June 12, 2024 and granted on June 12, 2024. *Id.*

23 (5) a stipulated request for an order modifying the Parties’ briefing schedule related to
24 Plaintiff’s motion to dismiss Defendant’s unfair competition counterclaim filed on July 17, 2024
25 and granted on July 18, 2024. *Id.*

26 (6) a stipulated request for an order modifying hearing schedule related to CelLink’s
27 Motion to File the First Amended Complaint filed on October 14, 2024 and granted on
28 October 15, 2024. *Id.*

1 WHEREAS, the brief extension of time requested here would have no effect on any other
2 scheduled deadlines for the case. Anderson Decl. ¶ 6.

3 WHEREAS, other than as set forth below, the parties agree that all other deadlines will
4 remain in place.

5 **NOW THEREFORE**, subject to the Court's approval, it is hereby stipulated and agreed
6 between Cellink and Manaflex, through their undersigned counsel, as follows:

7 1. Defendant Manaflex's time to file any response to the First Amended Complaint shall be
8 extended to December 18, 2024.

9 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

10
11
12 Dated: December 4, 2024

BOIES SCHILLER FLEXNER LLP

13 /s/ Alison L. Anderson

14 Alison L. Anderson

Eric J. Maurer

15 Beko Reblitz-Richardson

16 *Attorneys for Defendant Manaflex LLC*

17
18 Dated: December 4, 2024

/s/ Andrea Levenson

HAYNES BOONE

19 Jason Lao

Brian Kwok

20 Ken Parker

Andrea Levenson

21 *Attorneys for Plaintiff Cellink Corp.*

ECF ATTESTATION


I, Alison L. Anderson, am the ECF User whose ID and password are being used to file this Stipulation Regarding Extension of Time to Respond to Plaintiff's First Amended Complaint and [Proposed] Order. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Andrea Levenson, counsel for CelLink Corp., has concurred in this filing.

Dated: December 4, 2024

/s/ Alison L. Anderson
Alison L. Anderson

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

2
3
4
5 Dated: 12/5/2024


The Honorable Haywood S. Gilliam, Jr.
United States District Judge